

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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DR. MORGAN REYNOLDS on behalf of the  
UNITED STATES OF AMERICA,

Civil Action  
No. 07 CV 4612

Plaintiff / Realtor,

vs.

SCIENCE APPLICATIONS INTERNATIONAL  
CORP.; APPLIED RESEARCH ASSOCIATES, INC.;  
BOEING; NuSTATS; COMPUTER  
AIDED ENGINEERING ASSOCIATES, INC.;  
DATASOURCE, INC.; GEOSTAATS, INC.;  
GILSANZ MURRAY STEFICEK LLP;  
HUGHES ASSOCIATES, INC.; AJMAL  
ABBASI, EDUARDO KAUSEL;  
DAVID PARKS; DAVID SHARP; DANIELE  
VENEZANO; JOSEF VAN DYCK, KASPAR  
WILLIAM; ROLF JENSEN & ASSOCIATES,  
INC.; ROSENWASSER/GROSSMAN CONSULTING  
ENGINEERS, P.C.; SIMPSON GUMPERTZ &  
HEGER, INC.; S.K. GHOSH ASSOCIATES,  
INC.; SKIDMORE, OWINGS & MERRILL,  
LLP; TENG & ASSOCIATES, INC.;  
UNDERWRITERS LABORATORIES, INC.;  
WISS, JANNEY, ELSTNER ASSOCIATES,  
INC.; AMERICAN AIRLINES; SILVERSTEIN  
PROPERTIES; and UNITED AIRLINES,

Defendants.  
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**NOTICE OF MOTION TO  
DISMISS THE COMPLAINT  
PURSUANT TO FED R.  
Civ. P. 12(b)(1), (6)**

**PLEASE TAKE NOTICE** that upon the annexed Memorandum of Law, dated October 8, 2007, the declaration of Michael J. Vardaro, dated October 8, 2007, and the exhibits attached hereto, Defendant Skidmore, Owings & Merrill, LLP will move before the Honorable Gerald Lynch, United States District Judge at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York, on the date and time to be determined by the Court, to dismiss the complaint of Relator Dr. Morgan Reynolds, pursuant to Rules 12(b)(1) and

12(b)(6) of the Federal Rules of Civil Procedure, together with attorneys' fees and expenses pursuant to 31 U.S.C. § 3730(d)(4), and for such other and further relief as this Court deems just.

Dated: New York, New York  
October 8, 2007

Respectfully submitted,

ZETLIN & DE CHIARA, LLP  
*Attorneys for Defendant*  
*Skidmore, Owings & Merrill, LLP*

A handwritten signature in black ink, appearing to read "Michael J. Vardaro", written over a horizontal line.

Michael J. Vardaro  
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